

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Rochester,

Debtor.

Case No. 19-20905

Chapter 11

**DECLARATION OF ATTORNEY ANNETTE P. ROLAIN IN SUPPORT OF
FIRST STATE INSURANCE COMPANY'S MEMORANDUM OF LAW REGARDING
ITS STANDING TO OPPOSE THE DIOCESE OF ROCHESTER'S MOTION FOR
ENTRY OF AN ORDER (I) APPROVING THE RSA, (II) AUTHORIZING THE
DIOCESE TO ENTER INTO AND PERFORM UNDER THE RSA, (III) APPROVING
THE COMMITTEE SETTLEMENT, AND (IV) GRANTING RELATED RELIEF**

I, Annette P. Rolain, hereby declare as follows:

1. I am an attorney in the law firm of Ruggeri Parks Weinberg LLP, counsel for First State Insurance Company. I am competent to testify to the following facts and have personal knowledge of the truth of the matters set forth herein.

2. I submit this Declaration in connection with First State Insurance Company's Memorandum of Law Regarding its Standing to Oppose the Diocese of Rochester's Motion for Entry of an Order (I) Approving the RSA, (II) Authorizing the Diocese to Enter Into and Perform Under the RSA, (III) Approving the Committee Settlement, and (IV) Granting Related Relief and First State Insurance Company's Summary Objection to the RSA.

3. Attached hereto as Exhibit 1 is a true and correct copy of First State Insurance Company Policy No. 926708 as previously provided to the debtor.

4. Attached hereto as Exhibit 2 is a true and correct copy of Certain Insurers' Objection to Debtor's Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter into and Perform Under the Restructuring Support Agreement, and (III) Granting Related Relief (July 22, 2021), as filed in

In re Boy Scouts of America and Delaware BSA, LLC, No. 20-10343-LSS (Bankr. D. Del) at Docket No. 5684.

5. Attached hereto as Exhibit 3 is a true and correct copy of Debtor's Omnibus Reply in Further Support of Debtor's Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement, and (III) Granting Related Relief (July 26, 2021), as it was filed in *In re Boy Scouts of America and Delaware BSA, LLC*, No. 20-10343-LSS (Bankr. D. Del) at Docket No. 5759.

6. Attached hereto as Exhibit 4 is a true and correct copy of the transcript of the oral ruling on Debtor's Motion for Entry of an Order, Pursuant to Sections 363(b) and 105(a) of the Bankruptcy Code, (I) Authorizing the Debtors to Enter Into and Perform Under the Restructuring Support Agreement, and (III) Granting Related Relief, held before the Honorable Laurie S. Silverstein on August 19, 2021, in *In re Boy Scouts of America and Delaware BSA, LLC*, No. 20-10343-LSS (Bankr. D. Del).

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 30th day of December, 2022 at Washington, D.C.



Annette P. Rolain